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Attorney for Jeremiah Foster

Liquidating Trustee

## UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF MONTANA

In re Case No. 15-60979-11

SHOOT THE MOON, LLC,

Debtor.

## NOTICE OF PROPOSED AMENDMENT TO LIQUIDATING TRUST

Chapter 11 Liquidating Trustee, Jeremiah Foster, by and through his counsel of record, hereby files with the Court the Summary of Proposed Amended Liquidating Trust, attached hereto as Exhibit A, and Ballot for approval or disapproval of the Proposed Amendment, attached hereto as Exhibit B.

Chapter 11 Liquidating Trustee, Jeremiah Foster, also notifies the Court that the above-referenced documents were mailed on August 17, 2021 via US First Class Mail and Electronic Mail to the list of recipients, attached hereto as Exhibit C.

DATED this 17<sup>th</sup> day of August, 2021.

COTNER LAW, PLLC

/s/ Kyle C. Ryan

Kyle C. Ryan

Attorneys for Liquidating Trustee, Jeremiah Foster

## **CERTIFICATE OF SERVICE**

I, the undersigned, do hereby certify under penalty of perjury that on the 17th day of August, 2021, a copy of the foregoing Notice was served by electronic means pursuant to LBR 9013-(d)(2) on the parties noted in the Court's ECF transmission facilities and by mail on the following individuals and/or entities:

- Funding Metrics, LLC c/o Tim Dailey, Esq.
   Milodragovich, Dale & Steinbrenner, P.C. 620 High Park Way
   P.O. Box 4947
   Missoula, MT 59806
- IOU Central, Inc.
   c/o Mark A. Ellingsen
   WITHERSPOON KELLEY
   The Spokesman-Review Building
   608 Northwest Boulevard, Suite 300
   Coeur d'Alene, ID 83814
- IOU Central, Inc. c/o Paul G. Wersant
   3245 Peachtree Parkway, Suite D-245 Suwanee, GA 30024
- 4. Charles Parker 1120 Kakala Street Unit 509 Kaploei, HI 96707
- Prairie Mountain Bank c/o Randall C. Lester Falcon, Lester & Schaff, P.C. 25 5<sup>th</sup> Street North, Suite 202 Great Falls, MT 59401
- 6. Eulailo Cabrales-Cervantes 907 Ave. C. NW Great Falls, MT 59401
- 7. Oversight Committee of the Liquidating Trust
  - a. Robert Simson
     Vice President
     Western Alliance Bank
     2701 East Camelback Road, Suite 120

Phoenix, AZ 85016.

Counsel:
W. Scott Jenkins, Jr.
Alissa Brice Castaneda
Quarles & Brady, LLP
Renaissance One
Two North Central Avenue
Phoenix, AZ 85004-2391

## COTNER LAW, PLLC

By: /s/ Kyle C. Ryan
Kyle C. Ryan
Attorneys for Liquidating Trustee,
Jeremiah Foster